UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

ECOLOGICAL RIGHTS FOUNDATION, a non-profit corporation,

Civil Case No. 20-cv-6893-VC

Plaintiff,

V.

U.S. ENVIRONMENTAL PROTECTION AGENCY,

Defendant.

[PROPOSED] ORDER GRANTING STIPULATED PRODUCTION SCHEDULE AND REQUEST TO VACATE CURRENT DEADLINES AND COURT APPEARANCES

Pursuant to the Parties' Stipulation, and good cause appearing, the Court orders as follows:

- 1. EPA will produce records responsive to EcoRights' Freedom of Information Act request, which forms the basis of this lawsuit, on the following schedule:
 - April 8, 2021 (interim production of records)
 - June 15, 2021 (interim production of records)
 - August 6, 2021 (interim production of records)
 - September 7, 2021 (final production of records)
- 2. Upon completion of production, EPA will provide EcoRights with a final determination;
- 3. By November 5, 2021, the Parties will file a joint status report informing the Court whether any issues remain to be litigated and will propose a briefing schedule for resolving those issues, if any;
- 4. All pending deadlines and court appearances, including the February 24, 2021 joint status report and the May 3, 2021 case management conference, are vacated.

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The parties may not alter the deadline for the final production of records without Court approval.

DATED: _	March 10, 2021	 STATES DISTRICT CO
		The Ton IT IS SO ORDERED A Trib AS MODIFIED Judge Vince Chhabria Judge Vince Chhabria